## To UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In re:

Stark Energy, Inc.,

Chapter 11, Subchapter V Case No. 24-30168

Debtor.

## MOTION FOR CONTINUANCE OF CONFIRMATION HEARING

The Debtor, by his undersigned attorney, respectfully requests a continuance of the confirmation hearing currently scheduled for February 6, 2025, as well as an extension of the January 6, 2025 deadline to file a modified plan of reorganization, January 7, 2025 deadline to serve the modified plan, order and ballot, February 4, 2025 deadline to submit ballots and file objections to plan confirmation and the February 5, 2025 deadline to submit exhibits in support or an objection of confirmation.

The Debtor requests that the deadline be extended an additional 45 days. The court has jurisdiction of this case pursuant to 28 U.S.C. §§ 157 and 1334.

- 1. The United States Trustee filed an objection to the Debtor's confirmation expressing concern, among other issues, that the Debtor has not filed tax returns.
- 2. The Debtor has been informed by its tax preparer that additional time will be needed to complete and file tax returns.
- 3. The Debtor, through its attorney, has communicated with the United States Trustee and has requested a continuance of the confirmation hearing to allow the Debtor to demonstrate the financial performance required to confirm its plan and to file

its tax returns. The United States Trustee has indicated by telephone that it would not object to a continuance.

WHEREFORE, the Debtor respectfully requests a continuance of the confirmation hearing for an additional 45 days as well as an extension of the deadlines in the Second Amended Scheduling Order (Doc 200) based on the date of the continued confirmation hearing.

Ahlgren Law Office, PLLC

Dated: December 27, 2024 /s/Erik A. Ahlgren

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ATTORNEY FOR DEBTOR